

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**DOBBINS CHANG, LLC  
d/b/a FANTASY PLAZA,**

**Plaintiff**

**v.**

**THE CITY OF HOUSTON, et al**

**Defendants**

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**CIVIL ACTION NO. 4:18-CV-299**

**DEFENDANTS' RESPONSE AND OPPOSITION TO PLAINTIFF'S MOTION TO RE-  
STYLE CASE**

Defendants Harris County and Rosemarie Donnelly are opposed to Plaintiff's Motion to Re-Style the Case as Dobbins Chang LLC d/b/a/ Fantasy Plaza, Plaintiff v. Harris County and Rosemarie Donnelly.

Plaintiff has failed to state a claim upon which relief can be granted against Defendants Harris County and Rosemarie Donnelly, as will be briefed for the Court in a Motion to Dismiss under Fed. R. Civ. P. 12(b)(6), to be filed shortly. In addition, Plaintiff has named the wrong parties. Accordingly, to avoid confusion, Defendants respectfully request that the style of the case remain unchanged at least until a ruling on the Defendants' Rule 12(b)(6) Motion.

Respectfully submitted,

VINCE RYAN  
Harris County Attorney

/s/ Celena Vinson  
CELENA VINSON  
Assistant County Attorney  
Texas State Bar No.:24037651  
Federal I.D. No. 2220428

Harris County Attorney's Office  
1019 Congress, 15th Floor  
Houston, Texas 77002  
(713) 274-5181 (telephone)  
(713) 755-8924 (facsimile)  
[celena.vinson@cao.hctx.net](mailto:celena.vinson@cao.hctx.net)

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing document has been filed with the Court on this 7<sup>th</sup> day of March 2018, and served upon all parties registered to receive notice using the ECF system.

/s/Celena Vinson  
CELENA VINSON